

EXHIBIT “E”

From: Mike Trauben
Sent: Sunday, December 10, 2023 11:47 PM
To: google-legal-support@google.com
Cc: Michael Jon Samuels; Justin Trauben
Subject: RE: Vástago Producciones, LLC v. Heaven Publishing LLC and Michael Rodriguez (Internal Ref. No. 47263891)
Attachments: [23-11-09] Subpoena to Produce Documents [YouTube - Google LLC].pdf; Exhibit 1 - Google Subpoena.pdf
Importance: High

Dear Google – regarding this matter, we wanted to follow-up as no one from Google was seemingly able to attend the below meet and confer conference. In this regard, is Google able to simply produce the documents/information requested in the attached Subpoena related to the Musical Works and Sound Recordings set forth in the **Exhibit “1”** (re-attached as a separate document hereto for ease of reference)? All parties to this Action are seeking this same information which, distilled to its core, consists of requesting that Google/YouTube please simply provide the information reflecting the revenues/income/royalties YouTube has collected in connection with the attached Musical Works/Sound Recordings to date, including to whom Google/YouTube has paid any such revenues/income/royalties it has collected, and the amount of revenues/income/royalties Google/YouTube is currently holding in connection with these Musical Works/Sound Recordings.

Can this information simply be provided at this time per the Subpoena?

Thank you,
Mike Trauben

[Attorney Bio](#) | [Email](#) | [vCard](#)



From: google-legal-support@google.com <google-legal-support@google.com>
Sent: Tuesday, November 28, 2023 9:40 AM
To: Mike Trauben <mtrauben@singhtraubenlaw.com>
Cc: Michael Jon Samuels <MSamuels@singhtraubenlaw.com>; Justin Trauben <jtrauben@singhtraubenlaw.com>; Noemi Hernandez <NHernandez@singhtraubenlaw.com>
Subject: RE: Vástago Producciones, LLC v. Heaven Publishing LLC and Michael Rodriguez (Internal Ref. No. 47263891)

Hello,

Thank you for your email. It looks like **11:30am PST on Friday, December 1** works. Please use the below dial-in information to connect to the call at that time:

Dial: (US) +1 253-289-5692

PIN: 807 975 456 04#

Regards,
Google Legal Investigations Support

On Mon, Nov 27, 2023 at 20:25 UTC mtrauben@singhtraubenlaw.com wrote:

Hi,

Thank you very much for the response to the Subpoena issued in the above-referenced matter. As a meet and confer call could certainly help streamline the process and likely assuage any perceived concerns regarding the Subpoena, is there perhaps a convenient time to discuss this matter on Thursday, November 30 or, alternatively, anytime on Friday, December 1, between 11:00 a.m. PST and 1:30 p.m. PST?

Thank you again,

Mike Trauben

[Attorney Bio](#) | [Email](#) | [vCard](#)

From: google-legal-support@google.com <google-legal-support@google.com>

Sent: Monday, November 27, 2023 10:50 AM

To: Mike Trauben <mtrauben@singhtraubenlaw.com>

Subject: Re: Vàstago Producciones, LLC v. Heaven Publishing LLC and Michael Rodriguez (Internal Ref. No. 47263891)

Hello Michael,

Please see the attached letter regarding the above-captioned matter. If you would like to set up a phone call with our team to meet and confer regarding this matter, please let us know in a reply to this email.

Regards,
Google Legal Investigations Support

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